



**Western Washington Amateur Relay Association**

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RECEIVED

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Office of the Secretary,  
Federal Communications Commission  
Room 222, 1919 M Street NW  
Washington, D.C. 20554

Re: RM -9267

The Western Washington Amateur Relay Association (WWARA) of Washington State would like to go on record in opposition to the proposal to grant portions of 420- to 450 MHz to Land Mobile Services as proposed in RM-9267.

The WWARA is an organization made up of Amateur Radio Operators and Land Mobile Professionals who have been providing frequency coordination and related services to in Western Washington State since 1976.

This proposal gives cause for great concern. Here in Western Washington the WWARA presently has coordinated 498 Amateur Relay/Repeater systems on various Amateur Bands from 50 to over 1200 MHz. The impact of this proposal would be nothing short of disastrous as some 55% of our coordinated systems operate within the spectrum that would be negatively impacted by this proposal. Some 276 existing operating system operations would be terminated and others severely impacted.

The Commission is well aware of Amateur Radio contribution to Emergency Communications in times of Emergency; the documentation behind this statement is measured in tons rather than pages. I wish to point out that in times of local and regional emergencies, such as last winters Ice Storms in the Northeast and this springs Tornadoes in the Southeast, the frequencies that Amateurs utilize are within the VHF and UHF spectrum. The bands most heavily used are the 144-148 and 420-450 MHz bands. The loss of this spectrum would certainly cripple the ability of Amateur Radio to perform the public service tasks that it has become so famous for over the years!

The Commission needs to understand that we are not talking about simple communications systems here, made out of junk box parts and communication

system castoffs. Many of these systems are highly sophisticated and represent the efforts of individual parties as well as groups of amateurs, clubs and organizations. The cost of these systems is typically in the thousands of dollars. This money did not come from large corporations but in most cases from the pockets of the Amateurs themselves. In some cases additional funding has come from various local governments, departments of emergency management, Red Cross offices etc. who all know and appreciate the role played by Amateurs in emergency communications.

A visit to almost any department of emergency services office emergency operations center (EOC) here in Western Washington will reveal an array of communications equipment. Included in this will be amateur equipment operating on the 420 to 450 band ready and waiting for the next time it is needed.

The WWARA finds it difficult to believe that the Federal Communication Commission would even remotely consider rendering this vital spectrum unusable to Amateurs.

The WWARA is well aware that the proponents for this change contend that this spectrum could be shared in some manner with the Land Mobile industry. We find this contention to be nothing short of laughable. Perhaps the proponent feels that whereas Amateurs presently share this spectrum with the Military that Amateurs can share it with Land Mobile using the same formula. What the proponents fail to understand is the nature of the existing relationship. They also fail to understand that should the military require this spectrum for a National Emergency Amateurs would gladly surrender this spectrum and turn off their systems for the "greater good." Land Mobile and the existing Amateur Radio occupancy make sharing this spectrum impossible, a fact that the Commission's own staff will find to be quite true.

The lower ONE-THIRD of the 420-450 spectrum cannot be utilized by Amateurs to protect existing land mobile operation North of the U.S. Border. To think that the thousands of Amateur Radio systems operating in the upper two thirds of this band can share same with Land Mobile operations is a statement that only tends to inflame passions due to its obvious arrogant posture.

The Commission should understand that this is not an issue of greater good but a matter of greater profit. The proponents wishing to use this spectrum are looking at this spectrum primarily because they know well that the vast majority of the present users are Amateurs and not Corporations with huge bank accounts and large legal staffs. This is a simply matter of the hungry animal seeking weak prey.

The proponents well understand that it's in their best interest to seek new spectrum, spectrum that is largely utilized by Amateurs rather than spectrum that

is utilized by other commercial interests. The fact that the proponent would have to pay large sums of money is very likely had more to do with their decision to seek this spectrum than and spectral or technical efficiencies.

The WWARA is asking that the Commission ask themselves to what extent should further reduction in the allocated amateur radio spectrum be considered or even tolerated. In this day and age when just about everyone is claiming a spectrum shortfall we Amateurs have no choice but to look to our government to protect us. Protecting Amateur Radio Spectrum should be the DUTY of the government of this country in much the same manner as land is protected in Yellowstone or Mt. Rainier...or wet lands everywhere. Governments need to protect as well as serve.

It is interesting to look back at a previous effort at securing Amateur Radio used spectrum for commercial use. The WWARA can remember quite well the efforts of United Parcel and others to have portions of the then shared 220-225 MHz band for Land Mobile operations. The claim was very much the same, spectrum shortfall, lack of utilization etc. etc. The rest is now history. What is most disturbing is the distinct lack of commercial utilization of the 220-222 MHz spectrum. Here in the Seattle area there are only a couple of commercial systems operating in the entire 2 MHz of spectrum and none of the major manufacturers of equipment are making equipment for this spectrum. Believing that history is our best teacher, the WWARA rejects that there is an actual spectrum shortfall, if there were, this spectrum would be fully utilized.

The WWARA is puzzled by the claim of spectrum shortfall in light of a number of developments over the past several years.

- Re-Farming was supposed to greatly increase the amount of spectrum available to Land Mobile by making more efficient use of EXISTING Land Mobile allocations. The proponents needs could certainly be accommodate within this spectrum with the completion of this initiative.
- The existing UHF Land Mobile spectrum has seen a steady and continuous decline in occupancy in recent years. Land Mobile dealers are no longer selling UHF Base Stations and Mobiles due to the steady migration of their users to the feature rich systems such as Cellular and Enhanced SMR that utilize the 800 and 900 MHz bands. This process has once again been given a boost by the introduction of PCS. By any measurement, the utilization of the Land Mobile portions of the UHF Bands (450 to 512) is at an all time low. The WWARA submits that there is sufficient spectrum within the EXISTING Land Mobile allocation to handle the needs of the proponent.
- The recent decision regarding Digital Television whereby large quantities of spectrum formally allocated to the Broadcast Television industry will be

available for Land Mobile operations further tends to undermine the proponents allegation that it "needs" the 420 to 450 MHz spectrum.

- As a result of the transition from analog to digital television, a great amount of spectrum has been put "into the pipe" to be utilized for other purposes when analog television is phased out that will certainly be able to handle the needs of the Land Mobile industry long into the future

In summary, the Western Washington Amateur Relay Association urges the FCC to take the high ground and reject this proposal on the grounds that it is not necessary and is contrary to the interests and needs of the citizens of this country. The Commission should re-direct the proponents attention to the various other initiatives taken by the Commission to provide the spectrum the proponents claims are so necessary.

Western Washington Amateur Relay Association

  
Mark McKibbin  
Chairman